

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DOCKET NO. 05-30074-MAP

TAMMY WALKER,	)
Plaintiff	)
	)
v.	)
	)
CITY OF HOLYOKE,	)
Defendant	)

**DEFENDANT'S EMERGENCY MOTION TO EXTEND**  
**SCHEDULING ORDER OF FEBRUARY 23, 2007**

NOW COMES the defendant, City of Holyoke, and respectfully requests that this court extend the scheduling order issued on February 23, 2007 by 30 days with respect to each event. As reason for this request, the defendant states that its counsel received a telephone call at 2:10 p.m. on March 26, 2007 from Attorney Ozell Hudson advising that the plaintiff was not able to give a deposition on March 27, 2007, as previously scheduled, since she has allegedly been ill for the past five days. Plaintiff's counsel declined to state the nature of the alleged illness.

The plaintiff's continued deposition is needed with respect to both liability and damages issues. The defendant cannot determine whether an independent medical examination or an expert will be needed until the plaintiff's deposition has been completed. Furthermore, the defendant cannot prepare its motion for summary judgment until the plaintiff's deposition is completed. Finally, defendant states that this continuance is needed through no fault of the defendant.

WHEREFORE, the defendant, City of Holyoke, respectfully requests that this court extend the deadlines contained in the scheduling order of February 23, 2007 by 30 days due to the plaintiff's cancellation of her deposition scheduled for March 27, 2007.

The Defendants,  
CITY OF HOLYOKE,

By Its Attorneys  
MORRISON MAHONEY LLP

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I hereby certify that this document, filed through the ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on March 26, 2007.

/s/ Carole Sakowski Lynch